railfuture

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Initial Industry Plan

Dear Sir,

We are pleased to submit this consolidated national response on behalf of ***rail****future*, which has been prepared by the Policy, Lobbying and Campaigns committee, with contributions from individual branches. The document has been reviewed and approved by the committee.

Railfuture is a national voluntary organisation structured in England as twelve regional branches, and two national branches in Wales and Scotland.

The attached response is structured in three parts:

- Response to the Initial Industry Plan England and Wales, organised to correspond with the structure of the IIP document
- Response to the Initial Industry Plan Scotland
- Response to the Definition of proposed CP5 enhancements

We endorse the plan and hope that the constructive criticism in our response will contribute to the funding process.

If you require any more detail or clarification please do not hesitate to get in touch.

Yours faithfully

Chris Page

Chris Page
Railfuture
Policy, Lobbying & Campaigns Committee

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Response to the Initial Industry Plan - England and Wales

Railfuture endorse the Initial Industry Plan to develop the rail network and offer the following feedback in the spirit of constructive criticism:

Executive Summary. The plan recognises that economic and demographic trends, alongside government policy, will influence rail's future role (Section 2.1 Government Policy). Whilst the plan considers policy issues it does not address the effect that global economic trends will have upon the UK rail industry, or recognise that they will shape government policy. In our opinion fuel prices will continue to increase in real terms as developing countries require more energy and oil supplies decline. Fuel is a smaller proportion of overall costs for rail than other modes, so rail transport is less sensitive to fuel price inflation. Whilst government policy may attempt to soften the impact, increasing fuel prices will drive a modal shift from road to rail transport in the UK – witness the growth that has occurred since 2007 despite the recession (section 2.5.2)

Since rail's market share is relatively low at 7% overall, even a small percentage modal shift will represent a large percentage growth in rail traffic which could overwhelm the railway industry unless sufficient capacity increases are planned and the necessary investment made. The extra capacity provided and the extra journeys generated must be profitable, otherwise growth will drive a requirement for increasing subsidy, which will not be sustainable or politically acceptable.

Therefore the plan should make it clear that the key strategic objective is to put the industry on a sustainable financial footing. Investment is essential, and given the scarcity of investment capital, everything in this plan must contribute to this objective. Whilst unlikely to be achievable in CP5, the long-term objective should be for the industry to become profitable overall, so that future investment can be justified on commercial grounds (one of the key decision areas identified in the Foreword).

The six objectives listed in the Executive Summary all flow from this strategic objective. To achieve it the industry must reduce its unit costs (for example by investment in electrification and introduction of more competition) and increase revenue by increasing volume. Lower unit costs will make the industry more **efficient**, more **affordable to the taxpayer** and drive growth in the industry and **economic growth** overall. To attract more passengers and freight to the railway, higher **reliability**, meeting the **needs of passengers,** and public confidence in rail **safety** are essential. Finally modal shift from road to rail will contribute to a **lower carbon economy**.

This document is the rail industry's only input to the process, which determines funding for CP5. It is therefore addressed to government, not the customer, and is strong on the need for investment and savings but gives little detail on what savings in TOC operating costs and NR revenue requirements will be achieved. Much more detailed work must be done within the industry to create a business case which justifies the investment required by quantifying the savings which will be made. The railway industry must decide what message it wants to send to the public; this message must put the strategic objective in the context of global economic trends and explain the plan to give the public confidence of significant improvements in CP5 to justify the higher fares which will result from the RPI + x% formula.

Efficiency and affordability (page 7). Competition within the passenger rail market is limited to the franchising process. Once a franchise is won, the competitive element has gone, so the must the franchisee must be incentivised to reduce costs and increase traffic. Possibly access charges should be variable for each path, depending on the day and time. The value of the rail industry in terms of road congestion relief, reduced road accidents and improved air quality to the nation as a whole also deserves consideration.

Sustainability (page10). Note that electric rail services are lower cost as well as more carbon efficient than diesel.

Investment choices (page 10). Given the high level of committed investment in major projects during CP4 that extend into CP5 (Crossrail, Thameslink, GW electrification and IEP and costing £4.9B in CP5), there is only £5.6B proposed for new projects to deal with increased traffic, congestion etc.

1.2 Scope. The powers of the Welsh Government must be recognised in the plan.

2.1 Government policy. Whilst the rail industry is a major user of electricity and diesel, it is smaller proportion of overall costs than for other modes so rail is less sensitive to fuel price inflation than road or air, so increasing fuel prices will drive modal shift. Whilst national road pricing is ruled out, it should be recognised that a major shift to electric cars would accelerate the need for road pricing to replace the loss of tax revenue on petrol and diesel.

2.1.4 Fares. To make fares simpler and fairer, pricing should be harmonised between routes and areas of the UK to remove the differences inherited from British Rail and perpetuated by the RPI formula. This does not mean a standard price per mile; prices should reflect the speed and quality of the journey, and the demand for and cost of provision of the service. The plan should also consider that the government may wish to reduce the regulation of fares. It is important that pricing of journeys for which the customer does not have an effective choice (e.g. commuting within the London zonal boundaries) remain protected. Note that the RPI+3% formula does not apply next year for Wales; ATW will be RPI+1%.

2.3 Sustainable development. The plan states correctly that delivering the plan is about "how to do business" – the industry must operate like a commercial business. The sustainable development principles should include the provision of more journey opportunities through interchange stations to improve connectivity between existing routes and providing new services linking locations where there is a latent demand and existing infrastructure (see comment on section 5.5.3 below).

2.4 Long term planning. The plan is based on the previous Network RUS documents and Railfuture responses to these still stand. The RUS are focussed on existing routes and so do not address latent demand where no rail route currently exists, e.g. East-West Rail or orbital routes parallel to the M25 or North Circular Road. Whilst the latter are not achievable in the CP5 timeframe the long-term plan should address the possibility of new rail development to address these demands in the context of a long term modal shift to rail.

2.5.2 The cost of today's railway. Growth has been driven by increasing fuel prices. This trend will continue, causing a modal shift to rail. Statistics and expenditure in the future should have separate figures for Wales - it should be clear that the Welsh Government receives funding to support all ATW services except those wholly in England.

2.5.4 The outputs of today's railway – Punctuality and reliability. Disruption is not improving - sometimes alternative routes are also blocked, and some blockages are for a longer length than are actually required. Some operators substitute buses for longer distances than actually required because of transfer problems at turn back stations or the absence of a crossover for reversals.

2.5.4 The outputs of today's railway – Capacity. If the new high-density trains (procured for Thameslink and Crossrail) are used on long journeys, then the measure of capacity must be the number of seats, excluding standing, for calculation of train utilisation.

2.5.5 Choices and trade offs – Policy choices. The choice of whether improvements in efficiency are reflected in lower subsidy or lower fares should depend on whether sufficient capacity is available, ie the savings from improved efficiency should be used to provide sufficient capacity. Lowering fares when there is not sufficient capacity would only aggravate overcrowding. We support the introduction of smart ticketing to allow pricing to more accurately reflect demand.

3.3.1 Changing Network Rail – Revising standards and operating rules. Simplifying processes is key to reducing unit costs. This applies to the planning processes for network development as well as operating procedures. We support the concept of individuals taking responsibility for their own safety rather than relying on excessive heath and safety regulation. Care must be taken that new standards are not merely overlaid on the old, creating more bureaucracy.

3.3.1 Changing Network Rail – Multi-skilling and delivery. The workforce must be included in decision-making. More delegation of responsibility to individuals will encourage efficient working and reduce the risk of centralisation to labour relations.

3.4 Passenger train operator's plans to improve value for money. Sales of tickets through station shops, following the innovation by Merseyrail, could make savings compared to a ticket office without losing a staff presence.

4.3 Market analysis. Note that the spatial pattern of growth is also determined by the relative cost and time of rail commuting to Central London, which is a factor in each individual traveller's decision of where to live.

4.4.2 Sector outputs – Affordability of the sector. The plan relies on modal shift to generate both growth in volume and customer tolerance of above inflation increases in fares, so that revenue increases can replace subsidy.

4.5.2 Growth. Despite the London and South East RUS indicating that the SW main line into Waterloo is forecast to be the most overcrowded route into the capital by 2031, there are no proposals for increasing capacity and yet, by the end of CP5 in 2019 there will only be 12 years remaining to plan and implement a solution.

The rail share of orbital journeys in London is much lower than for radial journeys. Therefore the potential growth in orbital rail journeys is much greater. Since the L&SE RUS looks at existing routes only, it misses opportunities for development to capture latent demand for orbital journeys which are not currently rail-served.

Whilst not being promoted by Network Rail, there is no mention of the proposal for reopening the line between Bicester and Bletchley, known as the East-West Rail scheme which would provide through services between Oxford and Milton Keynes and beyond. We would have expected some recognition of this scheme and its benefits in the plan. To summarise, these are:

- excellent cost/benefit ratio
- through services between Reading/Swindon – Milton Keynes/Bedford which provide a more direct route avoiding the need to go via London, thus helping to relieve congestion
- much enhanced connectivity between Oxford/Milton Keynes themselves compared to the slow journey by road at present
- by extending Marylebone – Aylesbury trains through to Milton Keynes via a new station at Winslow opening up direct rail routes between Buckinghamshire's principal centres, again poorly served at present
- an alternative freight route between the south coast and midlands/north providing much needed extra capacity
- a very useful diversionary route between Oxford and the Midlands

This scheme has significant benefits to the economy of the area and social mobility by providing access to work and education opportunities in, for example, Oxford and Milton Keynes for those at present unable to benefit from them.

Other smaller projects are required to address capacity constraints, e.g. Alton – Farnham and Fareham – Botley.

4.5.3 Journey times. Note that faster journey times also improve stock and staff utilisation, and so may reduce costs. Opportunities for new services to address latent demand without network development should be exploited, for example WCML to Heathrow via Acton Wells, or Chiltern Line to Heathrow via Greenford (provided that capacity can be found on the GWML).

5.4.1 Sector outputs – Capacity. Weekend peaks are not acknowledged or recorded In some parts of the country peak use is late afternoons on Sundays and this is not always provided for. Event and shopping peaks are also not provided for. There is considerable overcrowding 150% on some trains when events are held at Cardiff and trains that leave passengers behind. These are not mentioned in this section. There is also the question of need for later and earlier services than those at present provided . Some parts oft he country require 24/7 services.

5.5.2 Growth. Railfuture strongly advocate investment in electrification and capacity enhancement of the Midland Main Line to bring it up to a standard comparable to other lines connecting London with the UK's major cities. More detail is given in Appendix A in response to the 'Definition of proposed CP5 enhancements'. Planning for Newark and Werrington ECML flyovers should also be started in CP5. Where possible enhancements should be combined with planned renewals to avoid further changes being required in future: for example segregation of traffic flows to Birmingham and Trent Junction, including the extra platforms to the east of the existing platforms, should be included in the planned Derby station track renewal.

5.5.3 Journey times and connectivity. Faster journey times also improve stock and staff utilisation, and so may reduce costs. For example there should be continuing improvements to the Plymouth to Paddington line, so that Plymouth is brought well within 3 hours of London, and the upgrade at Market Harborough to remove the curve and increase line speed should be in CP5.

6.3 Market analysis. It may be considered that long-distance commuting should not be subsidised as the commuter has a choice of where to live. Deregulation of these fares would impact growth.

6.4 The current railway – Affordability of the sector. The choice of whether improvements in efficiency are reflected in lower subsidy or lower fares should depend on whether sufficient capacity is available, ie the savings from improved efficiency should be used to provide sufficient capacity. Lowering fares when there is not sufficient capacity would only aggravate overcrowding. Whilst the long-term objective may be for the industry to be profitable overall, cross-subsidy within the industry will be necessary so that journeys originating on less used lines are not lost to rail, and to promote social inclusion.

In the regional sector, some services may always require subsidy, and in these cases we wish to highlight to government the wider economic and social benefits that rail transport provides. For example, in around 2003 the county of Gwynedd carried out a survey into the viability of the Cambrian rail network that required an annual subsidy of £900,000 at the time. The study found that the wider external benefits the service provided were worth around £3m per year in addition to social and other benefits that cannot be measured in monetary terms. Similarly, reopening the Welsh Highland railway has only been possible because grants totalling nearly £30m form local authorities, the Heritage Lottery and the EU Regeneration funds were provided together with about £10m worth of volunteer labour but it has been estimated that the railway will generate about £14m of external benefits to the region as a whole, effectively paying for itself in about 3 years even if it never makes a profit in commercial terms.

6.5.4 Journey times and connectivity. Faster journey times also improve stock and staff utilisation, and so may reduce costs. Minor network enhancements, e.g. the Todmorden curve, a new south to west chord at Yeovil Junction, or an east to south chord at Eastleigh, would provide new service and journey opportunities.

7.2.1 Strategic requirements. Note that the strategic objective of financial sustainability is met by the nine core principles. Electrification (objective VII) will drive lower costs. Objective VIII should make it clear that strategic freight terminals are required in more locations.

7.4.1 Outputs. The East-West Rail proposal, whilst not promoted by Network Rail, would reduce the need to run intermodal trains from Felixstowe via London. In conjunction with the East-West route, a flyover at Redhill would provide a through route for freight from the Channel Tunnel to the South West, South Wales and the West Midlands, avoiding London and the congested West London Line and promoting rail freight growth through the Channel Tunnel. The land required must be safeguarded to avoid planning permission being given for an alternative use.

Measures for gauge clearance and longer trains (eg 775m loops on the Southampton – Basingstoke – Reading route) are supported.

8.1.1 Customer information strategy. Information must also be made available to staff, as they are a key route for communication to customers.

8.1.2 Ticketing and retailing. Ticket sales need to be accessible; not all can be purchased from machines. There must be provision for manual sales at every station, either from a booking office or by the conductor on the trains. Sales of tickets through station shops, following the innovation by Merseyrail, could make savings compared to a ticket office without losing a staff presence.

8.1.3 Stations. Plans to improve stations should avoid multiple phases - for example the Basingstoke booking hall is currently being rebuilt whilst works to manage overcrowding are planned for CP5. This extends the period of disruption.

8.2.3 Electrification. Railfuture strongly support electrification of the Midland Main Line. The benefits include 20% savings on fuel and rolling stock maintenance. If progressed, DC to AC

conversion should be coupled with increases in capacity; conversion alone is not worth the inconvenience and delay to passengers during conversion. Conversion may not produce any reliability benefit either – overhead lines suffer regular failures, whilst third rail can be kept clear in severe weather by all-night running. The GWML electrification should be to Swansea and include the relief lines between Severn Tunnel and Cardiff West and the diversionary Vale of Glamorgan line. Cardiff Valley electrification must include the lines to Maesteg and Ebbw Vale and the Vale of Glamorgan line to give the best stock utilisation as well as all the other benefits of electrification.

8.2.5 European Rail Traffic Management System. The testing of ERMTS on the Cambrian lines has caused considerable disruption - it is essential the issues are resolved before deployment nationally.

8.3 Rolling stock. Capacity issues are becoming urgent, as is the need to start replacing aging and unsatisfactory designs like the Pacers. The aim should be for a consistent rate of new orders to create a stable market for new trains in the UK, which will help to contain rising costs of production, and to plan for future growth. The need to provide more capacity on long distance routes quickly has sometimes been met by using high-density stock, for example class 450 stock on the London-Portsmouth route. This has an adverse effect on passenger satisfaction and in the long term additional capacity should be provided by investment in infrastructure, not by increased crowding over longer distances whilst existing stock released by new build programmes must be cascaded to increase capacity elsewhere, care must be taken that the stock is appropriate for the services to which it is being redeployed, and is energy–efficient.

8.5.1 Investing in people. The workforce must be included in decision-making. More delegation of responsibility to individuals will encourage efficient working and reduce the risk of centralisation to labour relations.

9.4.2 Investing to reduce operating costs – Further network electrification. Railfuture endorse the Electrification RUS. The more of the network is electrified, the more that the business case for further electrification improves. For example, if the Cross Country route from Birmingham to Bristol is electrified, it improves the case for taking the wires on to Exeter and Plymouth. This would in turn dramatically strengthen the economic case for filling in the gap between Newbury and Taunton and so on. Similarly, infill electrification schemes reduce costs and improve interoperability – for example the Uckfield line should be considered, to avoid requiring extra diesel stock for train lengthening and allow cascade of diesel stock to Marshlink (section 9.4.3 page 137).

9.4.3 Investing to support & stimulate sustainable economic growth. Continued growth in national passenger demand during the recession shows that increasing fuel prices are driving modal shift. This trend will continue and investment will be required to provide the necessary capacity.

9.4.3 Investing to support & stimulate sustainable economic growth – Northern Hub. Services from Chester and North Wales and from Mid Wales require access to Manchester Airport and interchange with services to the east and North East, so should not be diverted to Manchester Victoria.

9.4.3 Investing to support & stimulate sustainable economic growth - Cross country train service connectivity. There should be adequate interchange between cross country services e.g. from North and Mid Wales to the High Speed Line at Birmingham.

9.4.3 Investing to support & stimulate sustainable economic growth – Western access to Heathrow Airport. This is strongly supported.

9.4.4 Investing to meet the needs of freight users – Gauge clearance on the Great Western Main Line. This must extend to Cardiff, even if not via the Severn Tunnel.

9.5.3 Passenger capacity. Assessment of the capacity of 'high density' rolling stock on Thameslink and Crossrail for longer distance trips should exclude the standing capacity, which is provided for central London journeys.

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Response to the Initial Industry Plan - Scotland

Railfuture endorse the Initial Industry Plan to develop the rail network. The feedback relating to the railway industry as a whole contained in our response to the Initial Industry Plan England and Wales also applies to the Initial Industry Plan Scotland.

In terms of service the priorities are for reliability, affordable fares, appropriate timetable, economic inclusion for both passenger and freight and competitive journey times without the exclusion of individual communities.

In terms of Network Expansion, Railfuture Scotland's priorities (taken from our response to the Scotland Second Generation RUS) are:

RFS1 Dornoch Link, Ready to go in 1986 but sabotaged after the departure of ScotRail's General Manager, Chris Green, who left ScotRail later that year. A 2007 independent Consultancy report confirmed this project would achieve a 45 minutes faster / 26 miles shorter route to the main centres of population and economic activity in the north Highland mainland and Orkney.

RFS2 Glasgow Crossrail – an integral part of previous SPT / Glasgow City Council ambitions to connect the separate networks north and south of the Clyde, reduce future growth pressures on the main Glasgow termini and regenerate much of the city centre long marginalised by motorway plans. The 2006 SPT consultancy study established a robust economic and financial business case for this project**.**

RFS3 Glasgow Airport Rail Link – Ready to go until cancelled in 2009 by the Scottish Government (along with their cancelling of the Edinburgh Airport Rail Link during 2007). The robustness of Glasgow Airport Rail Link is still upheld by its inclusion within the Government's National Planning Strategy (NPF 2) as a 'project of national significance' meriting early implementation.

RFS4 Methil – re-opening to passengers with most of the rail route still in existence.

RFS5 St Andrews – re-opening the rail link to the Home of Golf and world famous university and tourist town whose importance to the economy is recognized by its inclusion in both VisitScotland and Scottish Enterprise's top destinations. St Andrews now suffers pitiful car congestion whose effects can be felt as far back as Cupar, due to existing public transport not being attractive enough to entice visitors and residents out of their cars. A feasibility study is in progress.

RFS6 Kilsyth/Kirkintilloch – with turnbacks promoted at Lenzie/Croy and massive railhead park and rides the turnbacks should be located in the larger towns at present isolated from the rail network.

RFS7 Edinburgh South Suburban – restoration of passenger services on existing line.

RFS8 Grangemouth – restoration of passenger services on existing line.

RFS9 Alloa to Dunfermline – restoration of passenger services on existing line

RFS10 Kilmacolm – Last of the closures, bitterly opposed and should be reopened.

RFS11 Local passenger services on East and West Coast Main Lines.

RFS12 Halbeath cut-off – mentioned in the STPR. Possibly the first part of a reinstated direct line to Perth, without which rail will always be out-competed by road.

RFS13 Scottish Borders/Midlothian – Completion of the Borders Line reopening to Tweedbank, further extension beyond Tweedbank and possible extensions in Midlothian.

RFS14 Aberdeen Crossrail - A high frequency Inverurie - Aberdeen – Stonehaven rail service, with additional intermediate station, supported by the NESTRANS, to address the particular road congestion damage in Aberdeen (note in the RUS 6.6.5 *Peak capacity Aberdeen commuting*

assessments 2.3, 2.4, 2.5, the partial recommendation for elements of Aberdeen Crossrail but restricted because of high infrastructure investment cost).

RFS15 A limited number of station re-openings on existing lines to include communities which pay taxes to support train services to which they do not have reasonable access.

While these expansion priorities may be considered beyond the ORR Guidelines for RUS consultation they do link into future route utilisation. The list does not include the “Committed” projects for which Railfuture has campaigned and is grateful to the rail industry stakeholders promoting them. In particular, Railfuture congratulates Network Rail for succeeding in re-opening the Airdrie to Bathgate on time and on budget. It should be noted that the Railfuture Campaign in 1999/2000 to re-open this line, with the support of West Lothian Council, was largely dismissed as “impractical” by rail and transport industry leaders at the time.

Railfuture response to Definition of proposed CP5 enhancements

Railfuture welcome the all the proposals planned for CP5. In particular we strongly advocate investment to bring the Midland Mail Line up to a standard comparable with others running from London to major UK conurbations. This is vital for the East Midland's economic future and should not be sidelined by the promise of a high speed route which may or may not open in 25 years time.

1) Midland Main Line electrification (page 83):

To electrify the core scheme on the route including Bedford to Sheffield via Derby, Trent Junction to Nottingham, and Kettering to Corby.

2) Train lengthening on Midland Main Line's long distance services (page 85):

To improve infrastructure capability to enable the introduction of 11 x 23 metre vehicles on the MML on selected services in order to accommodate forecast levels of passenger growth by 2019, and to reduce crowding on services between London St Pancras and Corby, Nottingham, Derby and Sheffield.

3) Derby station area remodelling (page 87):

To provide a remodeled and segregated layout at Derby to improve the currently poor interaction at the junction between services to London and to the South West of England, in order reduce journey times and to improve performance.

4) Midland Main Line journey time improvement (page 38):

To provide a fund to deliver well targeted improvements in rail journey times and connectivity in England and Wales which should include the Market Harborough station realignment scheme and the Corby-Bedford slow line as top priorities.

5) Leicester area enhancements including Syston to Wigston remodelling (page 44/5):

To carry out works to meet the long term growth requirements and take advantage of the *'once-in-a-lifetime'* opportunity presented by the recontrol & relocking of the signaling in the Leicester area. This project will provide the network capability to accommodate anticipated growth in intermodal traffic from the port facilities at Felixstowe to terminals in the Midlands, North West, North East and Scotland. There would also be spin-off benefits for MML passenger services, including better punctuality and reliability and opportunities to increase service frequencies.

6) Sheffield station area (page 117):

In conjunction with planned signaling renewals, to remodel Sheffield station layout and its approaches to meet anticipated passenger and freight growth, ease crowding on local, regional and long distance services by allowing longer trains to operate, and to improve Nottingham to Leeds journey times. Additionally to carry out signaling renewals along the Hope Valley route and at Dore and Totley, including junction doubling at Dore Station Junction and Dore South Curve extension, on this busy but partly single track route between England's 3rd and 5th largest cities.

Our rationale for the above investment is supported by evidence from two fairly recent rail based reports:

> The Government's White Paper *"Delivering a Sustainable Railway"*, published in 2007, considered the potential challenges for the railway over a 30-year horizon. It identified several long-term agendas for Government and the rail industry working in partnership as follows:
>
> - ***increasing the capacity*** *of the railway whilst* ***further improving*** *safety and* ***performance***
> - *delivering a quality service for passengers*
> - ***improving cost effectiveness***
> - ***fulfilling rail's environmental potential***

The *"Rail transport submission to the Committee on Climate Change"* published in 2008 by a working group including Network Rail, DfT, ATOC and the ROSCO's, stated:

- ***electrification** is an important consideration given the **benefits** of electric trains over diesels in terms of **performance, reliability, capacity and carbon**".*
- *The funding and capacity of the industry to manage too many large projects means that the schemes which might be completed and will be considered as part of our further analysis are: Edinburgh - Glasgow, **the Midland Main Line**, the Great Western to Bristol and Swansea (following on from Crossrail), and the North East/South West fill-in.*

Of the electrification schemes in England & Wales noted above, the Great Western as far as Cardiff has now been selected well before the completion of Crossrail, while the **Midland Main Line** has fallen behind new projects in the north west of England that were not even listed. However, the same report shows in 2006/07 that "*Passenger density on NON-electrified lines"* between Bedford and Trent Junction near Nottingham, and from Sheffield to Dore, **exceeded** that on the Great Western lines west of Swindon, and also anywhere else in the England (Annex B).

Finally we would again quote the White Paper *"Delivering a Sustainable Railway"* which states:

- *"Environmental performance will be a determinant of future public perception for all businesses and for the transport sector in particular. It will help determine commercial success or failure. The Government will play its part, but it is vital that the rail industry is seen to take a lead. There are strong commercial reasons for it to do so, reinforced by its corporate social responsibility as suppliers to the public. The rail industry needs to have a collective environmental vision and support this with effective action".*

We therefore urge the railway industry and Government to take action now to ensure the economic viability of the East Midlands region.

Railfuture are also concerned that there are no planned enhancements in CP5 in the West of England – the following should be considered:

- Devon County Council plans for an additional hourly Exeter to Axminster service
- Extension of the proposed Axminster service through to Yeovil Pen Mill to provide connections with the Bristol to Weymouth line
- Hourly Exeter to Taunton services with reopened stations at Cullompton, Willand (old Tiverton Junction) and Wellington
- All day half hourly local service between Exeter and Paignton and a new station at Marsh Barton (Exeter).
- On the Paignton line a new station at Kingskerswell should have equal priority to the proposal for a new station at Edginswell (Torbay Hospital).
- Plympton remains one of the largest urban areas with no direct rail access, and needs a new station.
- The long established proposal to restore Tavistock to the rail network from the Plymouth direction. Work towards this scheme should be compatible with the objective of providing alternative route from Plymouth to Exeter.